

O'MELVENY & MYERS LLP

400 SOUTH HOPE STREET
LOS ANGELES, CALIFORNIA 90071-2899
TELEPHONE (213) 669-6000
FACSIMILE (213) 669-6407

EMBARCADERO CENTER WEST
275 BATTERY STREET
SAN FRANCISCO, CALIFORNIA 94111-3305
TELEPHONE (415) 984-8700
FACSIMILE (415) 984-8701

1999 AVENUE OF THE STARS
LOS ANGELES, CALIFORNIA 90067-6035
TELEPHONE (310) 553-6700
FACSIMILE (310) 246-6779

610 NEWPORT CENTER DRIVE
NEWPORT BEACH, CALIFORNIA 92660-6429
TELEPHONE (714) 760-9600
FACSIMILE (714) 669-6994

555 13TH STREET, N.W.
WASHINGTON, D. C. 20004-1109
TELEPHONE (202) 383-5300
TELEX 896222 • FACSIMILE (202) 383-5414

June
13th
1 9 9 6

CITICORP CENTER
153 EAST 53RD STREET
NEW YORK, NEW YORK 10022-4611
TELEPHONE (212) 326-2000
FACSIMILE (212) 326-2061

10 FINSBURY SQUARE
LONDON EC2A 1LA
TELEPHONE (0171) 256-8451
FACSIMILE (0171) 638-8205

SANBANCHI KB-6 BUILDING
6 SANBANCHI, CHIYODA-KU
TOKYO 102
TELEPHONE (03) 3239-2800
FACSIMILE (03) 3239-2432

1104 LIPPO TOWER
LIPPO CENTRE
89 QUEENSWAY, CENTRAL
HONG KONG
TELEPHONE (852) 2523-8266
FACSIMILE (852) 2522-1760

WRITER'S DIRECT DIAL NUMBER

(202) 383-5300

RECEIVED

JUN 13 1996

OUR FILE NUMBER
294,500-002
DC1-251773.V1

VIA SAME-DAY HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, D.C. 20554

Re: Ex Parte Presentation in MM Docket No. 92-266 / CS
Docket No. 96-60

Dear Mr. Caton:

On behalf of The Game Show Network, L.P. ("GSN"), the undersigned are hereby filing this letter with the Commission in accord with 47 C.F.R. § 1.1206(a). On June 13, 1996, Dick Block of GSN, Mark Riely of Media Group Research (a consultant to GSN) and the undersigned counsel met with the following: Commissioner Quello and Mr. James R. Coltharp, Legal Advisor to Commissioner Quello; Ms. Jackie Chorney, Legal Advisor to Chairman Hundt; Mr. David R. Siddall, Legal Advisor to Commissioner Ness; Ms. Suzanne Toller, Legal Advisor to Commissioner Chong; and Ms. JoAnn Lucanik, Division Chief, Ms. Lynn Crakes, attorney, Ms. Julia Buchanan, attorney, Mr. Rodney McDonald, attorney and Mr. Edward C. Gallick, Senior Economist, Cable Services Bureau.

Pursuant to 47 C.F.R. § 1.1206(a)(2), the following summarizes the data and arguments presented at each of these meetings. The materials distributed at the meetings demonstrate that despite a large number of cable programmers in the current market, unaffiliated programmers need vehicles such as leased access more than ever in order to reach subscribers. Allowing

this wide variety of programmers to use leased access as contemplated by the Commission's proposed rules will not significantly disrupt cable operating economics, nor will it result in a material disruption of channel line-ups. As such, and given that anticipated increases in channel capacity are not likely to result in greater access by unaffiliated programmers, the Commission should expeditiously adopt its proposed rules with such changes as have been proposed by GSN.

Written materials presented at each of the meetings are attached hereto as Exhibit A. An original and two copies of this letter are being submitted to the Secretary's office. An additional copy is submitted to be date-stamped. Please return the date-stamped copy to the courier for delivery to the undersigned.

Any questions regarding this filing should be referred to the undersigned.

Respectfully submitted,



John E. Welch



Jeffrey J. Carlisle

Counsel to The Game Show Network,
L.P.

Enclosure

cc: Commissioner Quello
Ms. Jackie Chorney
Mr. James Coltharp
Mr. David R. Siddall
Ms. Suzanne Toller
Ms. JoAnn Lucanik
Ms. Lynn Crakes
Ms. Julia Buchanan
Mr. Edward C. Gallick
Mr. Rodney McDonald

EXHIBIT A

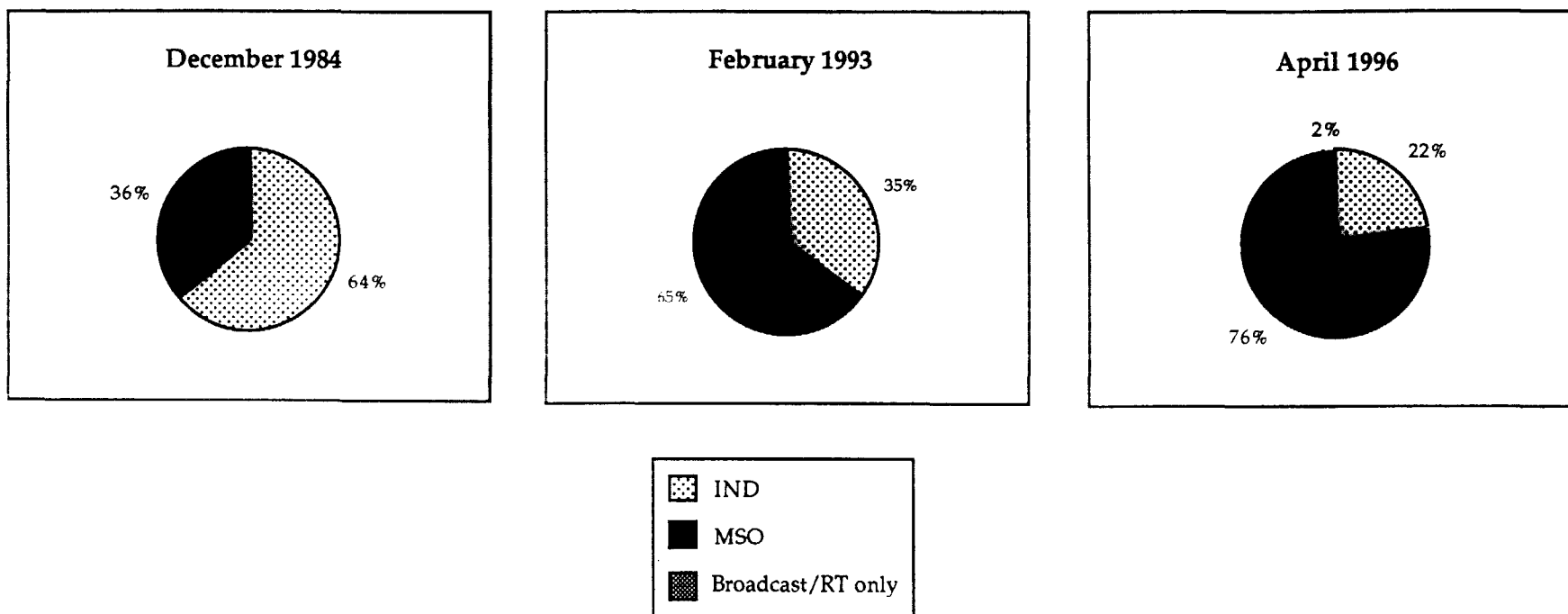
**WRITTEN MATERIALS PRESENTED IN CONNECTION WITH
EX PARTE PRESENTATION BY THE GAME SHOW NETWORK, L.P.**

JUNE 13, 1996

MM DOCKET NO. 92-266, CS DOCKET NO. 96-60

Diversity of Voices in Cable Programming is Shrinking

Cable Network Ownership Trend



Source: Exhibit A, Table 1, GSN Comment

Importance of Cable Diversity Grows As Cable's Share of Viewership Increases

One-Half of All Viewing in Cable HH's Is to Cable Programming

	Total TV HH	Non-Cable HH	Total Day Shares <i>All Cable</i> HH	Pay Cable HH
<i>Broadcast Network Affiliates</i>				
ABC	17%	22%	14 %	14%
CBS	15	21	13	11
NBC	16	20	14	13
FOX	<u>10</u>	<u>15</u>	<u>8</u>	<u>8</u>
Total	58	78	49	46
<i>Cable Programming</i>				
Basic	30	--	42	41
Pay	<u>6</u>	--	<u>8</u>	<u>15</u>
Total	36	--	50	58
<i>Independents</i>	12	18	9	9
<i>Public</i>	3	5	3	2

Note: Total shares exceed 100% due to multi-set usage.

Source: Cabletelevision Advertising Bureau, 1995 Factbook

***Inability of Independents to Gain Access is not a
Function of Size, Geographical Focus or Revenue
Source***

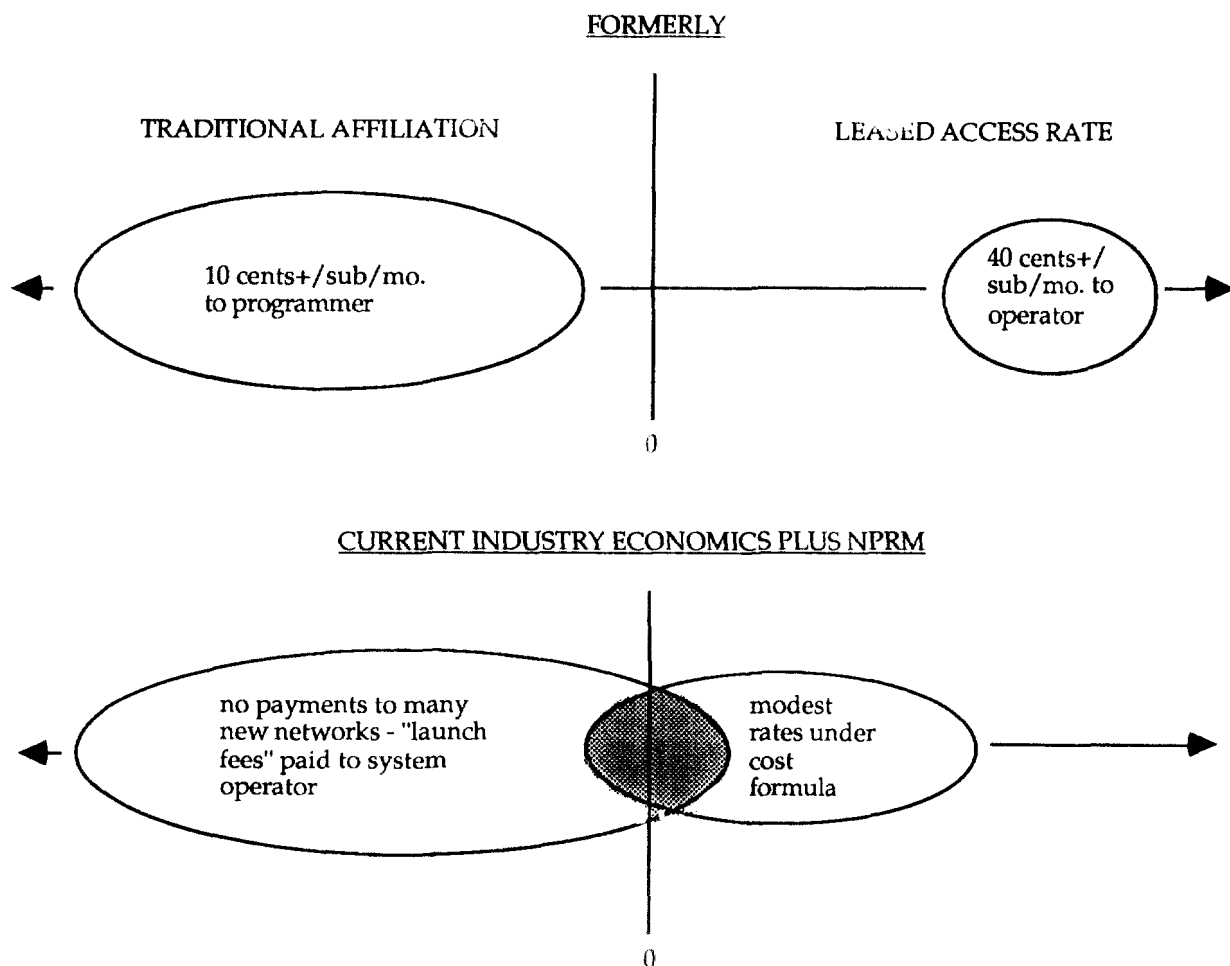
Big --- Small

National --- Local

Ad Supported --- Non-Profit --- Home Shopping

NPRM Formula Could Satisfy Economic Requirements of All These Leased Access Constituencies

Convergence of Distribution Economics with Reduced Leased Access Rates



Typical Cable System Would Experience Minimal Disruption

Assume: 46 channel capacity
 6 must-carry channels
 1 dark channel

Then: 4 channels nominal leased access set aside
 -1 channel dedicated to minority or educational
 programming

 3 channels actually available for leased access
 -1 dark channel

 2 channels at risk to be bumped*

 About the same amount of capacity the typical system
 adds each year.

*Incumbents on designated channels could, of course, bid for their slot under leased access.

Even High Capacity Systems Should Maintain Attractive Program Mix Under GSN Proposal to Insure Diversity

Assume: 68 channel capacity
 8 must carry channels
 2 dark channels
 2 channels currently offering home shopping/infomercial

Then: 9 channels nominal leased access set aside
 - 3 channels dedicated to minority or educational programming

 6 channels actually available for leased access
 - 2 dark channels

 4 channels at risk to be bumped*

Under GSN

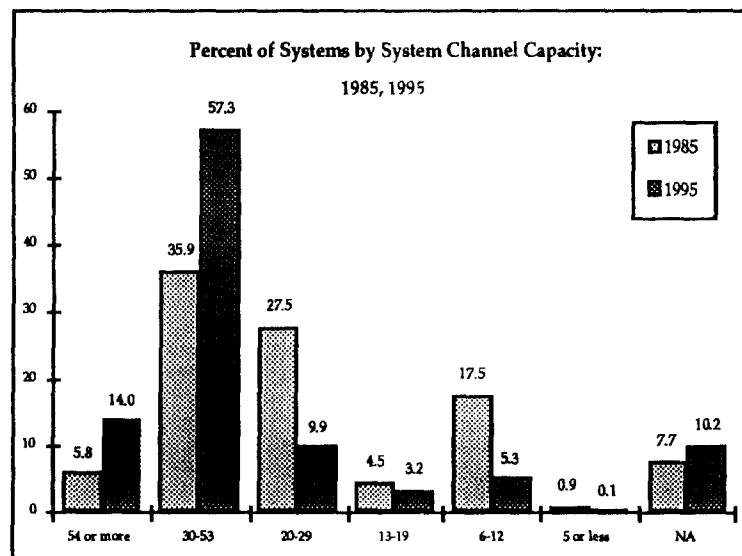
Diversity Proposal: of 6 channels actually available for leased access
 no more than 3 channels (i.e., 1/2) could be home shopping/infomercial
 if the 2 currently offering home shopping/infomercial were designated

 only 1 net additional home shopping/infomercial channel would be added to the system

*Incumbents on designated channels could, of course, bid for their slot under leased access.

Increase in Capacity Since 1984 Has Not Facilitated Leased Access Opportunities Nor, It Appears, Will Digital Compression Without FCC Action

- Literally dozens of channels have been added by the typical cable system since 1984 -- but operators contend they have no room for leased access.



Source: Warren Publishing, Inc., *Television & Cable Factbook*, Cable & Services Volume No. 53, 1985, p.1385; Services Volume No. 64, 1996, p. 1-81. Data as of April 1 (1985) and October 1 (1995). Percents rounded off.

- Early indication of system operator plans for digital compression indicate that provisions are still not being made for leased access.

TCI Digital Template - Hartford, Conn. (10/20/96 expected launch)

80 digital channels on top of 60-70 analog channels:

40 channels of pay-per view

25 channels of multiplexed premium services

15 channels of niche basic services

Source: Bear Stearns & Co., Inc. equity research, 4/18/96.
Report on TCI Annual Investors Meeting.

So Many Games. So Little Time.

SONY PICTURES
GAME SHOW



ALL ABOUT FACES



BEAT THE CLOCK



BLOCKBUSTERS



BODY LANGUAGE



CARD SHARKS



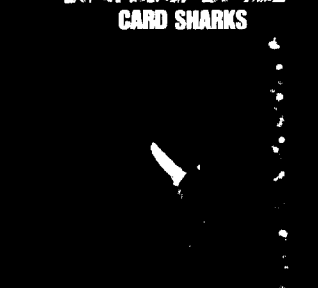
CELEBRITY CHARADES



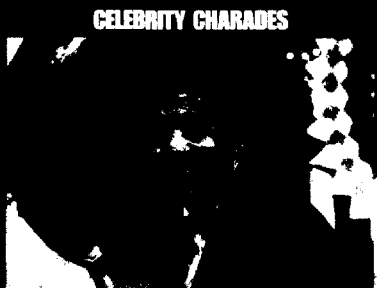
CHILD'S PLAY



THE DATING GAME



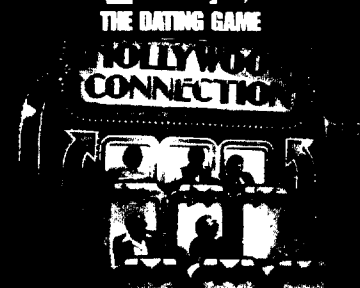
THE FUN FACTORY



THE GONG SHOW



HOLD EVERYTHING!



HOLLYWOOD CONNECTION



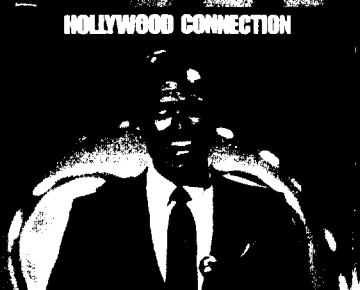
THE JOKER'S WILD



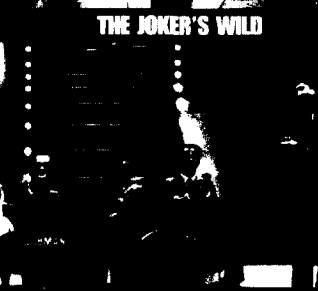
JUVENILE JURY



MATCH GAME



THE NEWLYWED GAME



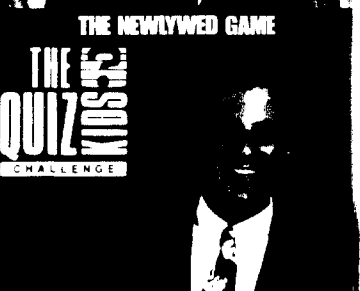
THE PERFECT MATCH



PLAY THE PERCENTAGES



THE PRICE IS RIGHT



THE QUIZ KIDS CHALLENGE



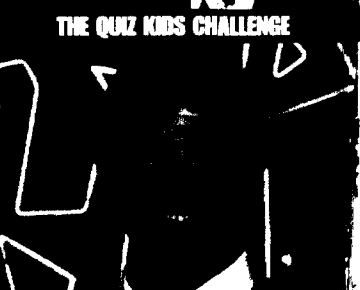
TIC TAC DOUGH



TO TELL THE TRUTH



TREASURE HUNT



TRIVIA TRAP

ENTERTAINMENT'S TV NETWORK



BREAK THE BANK



BULLSEYE



BUMPER STUMPERS



CAMOUFLAGE



THE DIAMOND HEAD GAME



DOUBLE DARE



FAMILY FEUD



FANTASY



HOT POTATO



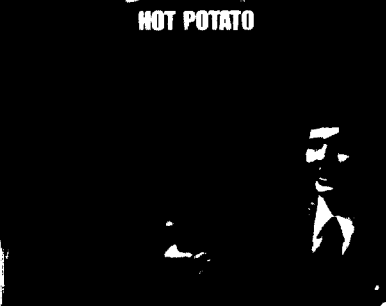
I'VE GOT A SECRET



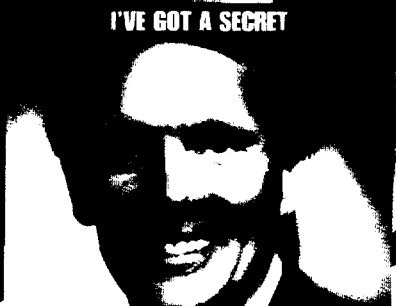
JEOPARDY!



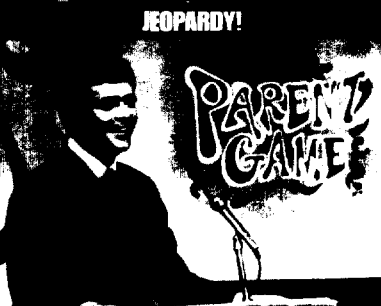
JOKER! JOKER!! JOKER!!!



NOW YOU SEE IT



OPPOSITE SEX



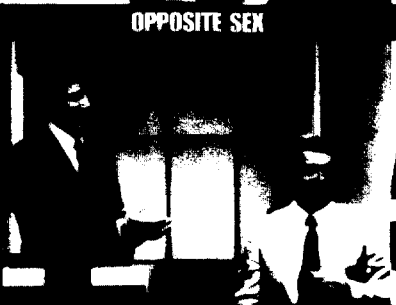
THE PARENT GAME



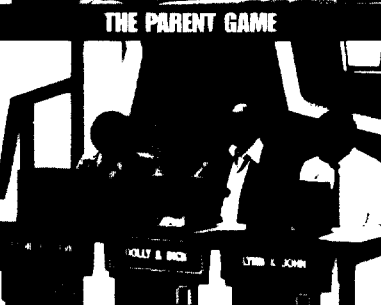
PASSWORD



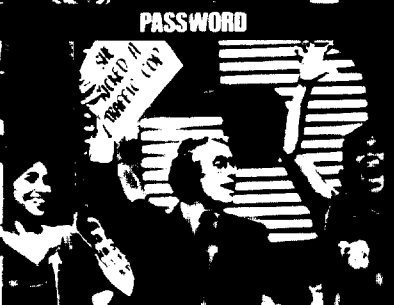
ROCKUS



SUPER PASSWORD



TATTLETALES



THREE'S A CROWD



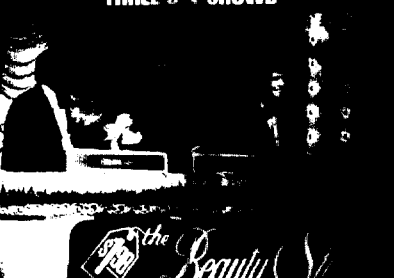
TWO FOR THE MONEY



WHAT'S MY LINE?



WHEEL OF FORTUNE



THE \$1.98 BEAUTY SHOW

- ✧ *Over 45,000 digitally-remastered episodes of classic and new game shows from the legendary libraries of Merv Griffin Enterprises, Chuck Barris, Mark Goodson Productions and Barry & Enright Productions.*
- ✧ *Over 50 different series, representing every television decade, from the 1950's through the 1990's.*
- ✧ *Twenty-four hours of game show programming daily, including live interactive game shows and newly produced entertainment features.*
- ✧ *Live-hosted morning, prime time and late night programming blocks.*
- ✧ *Weekend schedule features originally-produced, themed programs including Wide World of Games and Game Show Bloopers.*
- ✧ *Viewers register to play FREE live interactive game shows from home, and participate by using just their telephone and TV to compete for thousands of dollars in prizes.*
- ✧ *All registrants for interactive games become part of Game Show Network's valuable registration database.*
- ✧ *Programming is advertiser-friendly and never interrupted by infomercials, with unique value-added, customized opportunities appealing to a wide range of demographics.*

Representation

ITN Entertainment, Inc



747 3rd Avenue, 5th Floor
New York, NY 10017
(212) 572-9200
(212) 319-7195 FAX

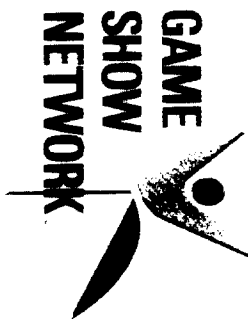
35 East Wacker, Suite 3450
Chicago, IL 60601
(312) 606-0881
(312) 606-0912 FAX



A division of Sony Pictures

Los Angeles Office
10202 West Washington Boulevard Culver City, CA 90232
(310) 280-8902 (310) 280-1359 FAX

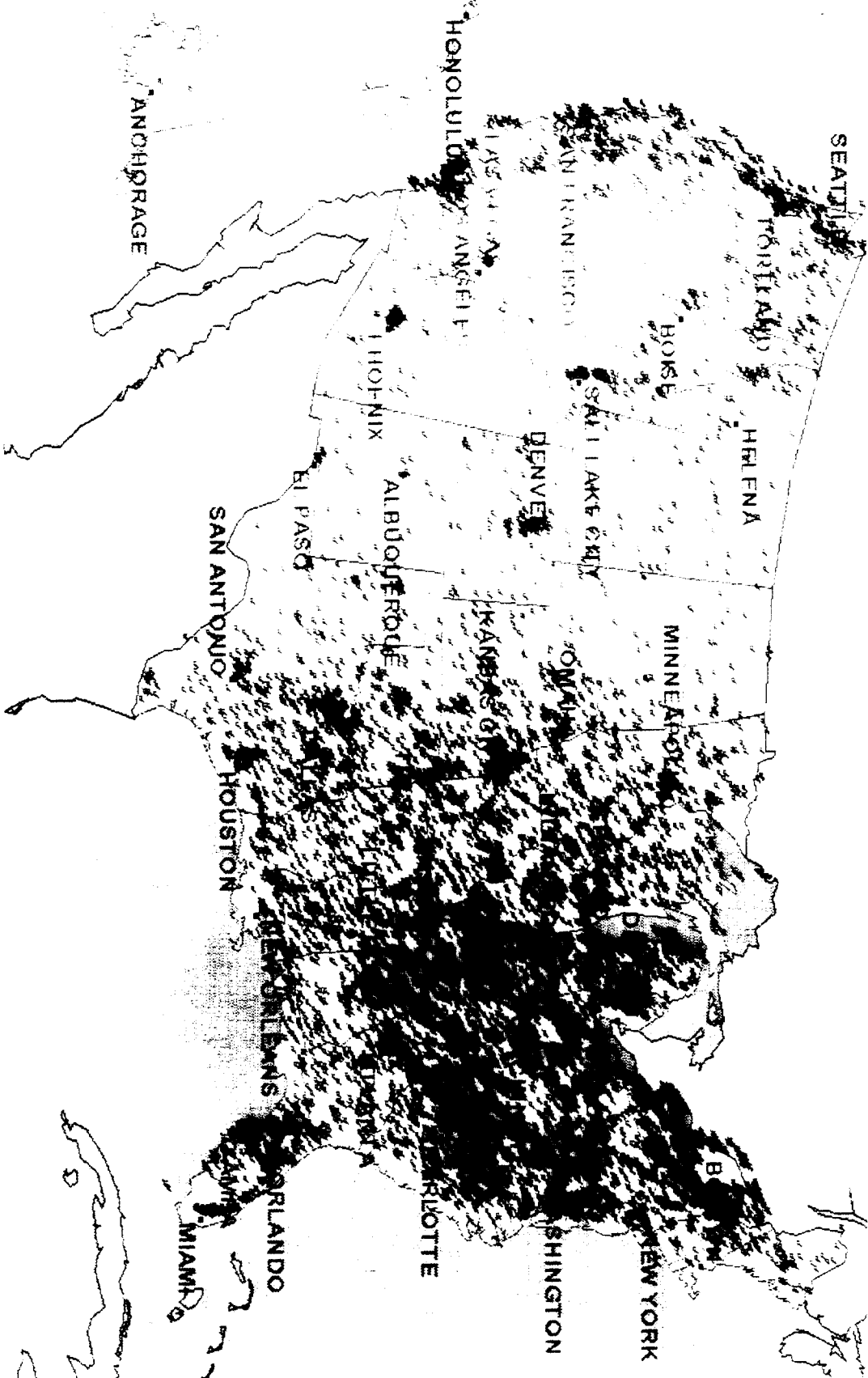
New York Office
550 Madison Avenue Suite 2000
(212) 833-8893



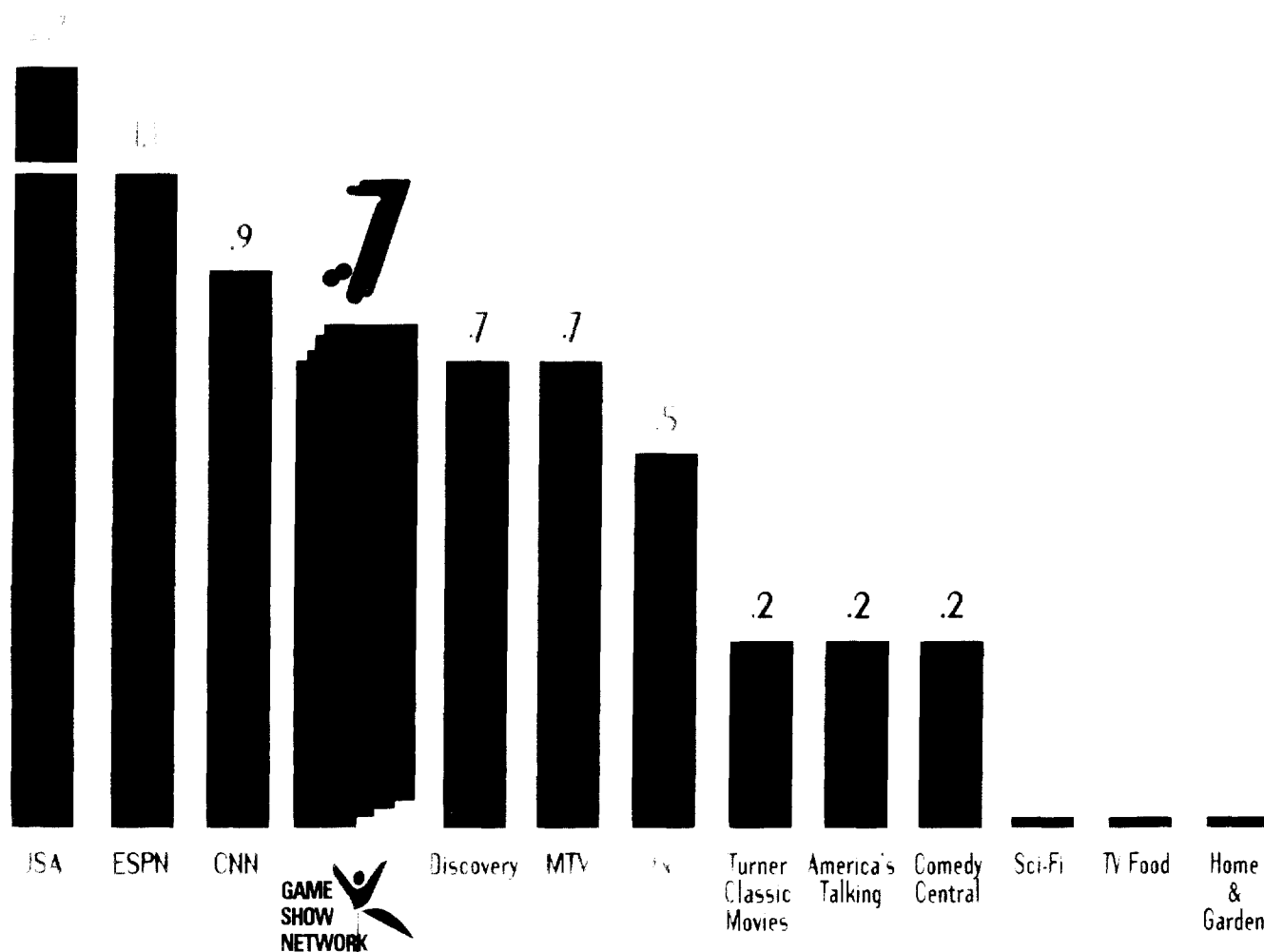
Registration Database

12/94-10/95

17,231



Nielsen Doesn't Play Games...



So Why Are We Jumping For Joy?

.7! That's why. Nielsen surveys are serious business, especially when it's your first national rating and you're only six months old. So are we excited by a .7? You bet. Surprised? Not really. After all, it's no secret that over 35 million viewers watch - and play - game shows every day. Still a .7 from Nielsen is nice confirmation. Confirmation that our daily mix of original, live, interactive game shows and classic television programs from a library of over 45,000 episodes is already a new favorite with viewers. Isn't it time for you to get in the game? For more information, call (310) 280-2222.

